RESPONSIVE TESTIMONY OF

LAURA MANZ

ON BEHALF OF

DOMINION ENERGY SOUTH CAROLINA, INC.

DOCKET NO. 2019-365-E

1 **Q.** **PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND**

2 **OCCUPATION.**

3 A.   My name is Laura J. Manz. My business address is 35 Iron Point Circle,

4 Suite 225, Folsom, CA 95630. I am employed by Guidehouse, Inc. as Director –

5 Power Delivery Solutions.

6

7 **Q.** **ARE YOU THE SAME LAURA MANZ THAT OFFERED DIRECT**

8 **TESTIMONY IN THIS DOCKET?**

9 A.   Yes, I am.

10

11 **Q.** **DO YOU AGREE WITH WITNESS SERCY'S CLAIM ON PAGE 14 THAT**

12 **A CPRE SHOULD INCLUDE "PROVISIONS FOR MANAGING**

13 **RENEWABLE ENERGY CURTAILMENT . . . GIVEN JURISDICTIONAL**

14 **UTILITIES WITHIN THE STATE HAVE A NON-TRIVIAL LEVEL OF**

15 **EXISTING SOLAR PV PENETRATION ON THE GRID?"**

1 A.   CPRE guidelines should address the unique situation of the utility to manage

2   the power grid. These include operating standards and requirements that may

3   impact reliability as informed by the utility's Integrated Resource Plan. As more

4   renewable resources are included in the resource mix, additional reliability factors,

5   including, for example, frequency control, increased Electric Load Carrying

6   Capability for shoulder hours or other times when renewables are not fully available,

7   may be considered. Utilities with high levels of renewable penetration should

8   include curtailment provisions given the increased likelihood of oversupply,

9   particularly where program design does not consider specific instances where

10   customer demand is mismatched to supply.

11   As the Commission noted, this is a complex matter that impacts a number of

12   other dockets. For example, the avoided cost docket where the form PPA was

13   established, the ongoing integration study docket, and the ongoing interconnection

14   docket could all potentially be impacted by any such decision. Although this is a

15   generic proceeding and meant to explore the issue broadly, any final decision by a

16   utility to move forward should thoroughly consider and address these issues.   .

17

18 **Q.   DOES   THIS   CONCLUDE   YOUR   PRE-FILED   RESPONSIVE**

19 **TESTIMONY?**

20 A.   Yes, it does.